



Sui Southern Gas Company Limited

Mr. Tahir Mahmood
Commissioner
Company Law Division
Securities and Exchange Commission of Pakistan
ISLAMABAD

CS/16
13 January 2016

Dear Sir,

**Application U/S. 170 of the Companies Ordinance, 1984 for
Holding of Annual General Meetings (AGMs) for the Years 2013 and 2014/
Exemption from Issuing Interim Financial Statements for 2014 and 2015**

At the outset, let me first thank the Securities & Exchange Commission of Pakistan for favorably considering our request for extension in the date of holding AGMs for 2013, 2014 and 2015 due to reasons beyond our control, explained at length in our earlier letters to the Commission **(Copy enclosed)**.

I am pleased to inform you that the audit of the financial statements of the Company for the financial years ended June 30, 2013 and June 30, 2014 have been finalized and the Company is in the process of submitting the financial statements to Board Audit Committee for review and then approval by the Board of Directors before presenting them in the Annual General Meetings which the Management intends to hold with a gap of few hours on a single day next month. However, we understand that before finalizing the financial statements for the year ended June 30, 2014, the Company is required to issue interim financial statements (quarterly and half yearly) of 2013-14 as required under Section 245 of the Companies Ordinance, 1984. Further, the notice for holding AGM of 2014 for the adoption of the Accounts in respect of the financial year ended June 30, 2014 could only be issued in the ordinary course after the financial statements for the year ended June 30, 2013 are adopted in the AGM for 2013.

Sir, you will appreciate that the objective of preparing and issuing interim financial statements is to keep both present and prospective stakeholders of the Company informed about the affairs of the Company. The issuance of interim financial statements by the Company after the lapse of more than one and half year may not be relevant for the stakeholders and will take extra time due to compliance of statutory requirements.

In view of the above and taking into account the extraordinary situation which SSGC is confronted with arisen due to reasons not attributable to SSGC, requires extraordinary steps to remedy the situation in the larger interests of the stakeholders. Therefore, we request the Commission to grant the Company following waivers by issuing specific directions under Section 170 of the Companies Ordinance, 1984:

Sui Southern Gas Company Limited

Dr. Ziauddin Ahmed Road, P.O. Box No. 540 Karachi.

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- (i) Exemption from issuing interim financial statements under Section 245 of the Companies Ordinance, 1984 for the quarters ended September 30, 2013 and 2014, half years ended December 31, 2013 and 2014 and nine months ended March 31, 2014 and 2015 and;
- (ii) Permission for holding single Board Audit Committee Meeting as well as Board of Directors Meeting for review and approval of Financial Statements for 2012-13 and 2013-14;
- (iii) Permission for holding of Annual General Meetings for 2012-13 and 2013-14 on a single day with a gap of few hours; and
- (iv) Permission to issue Annual Report 2014 to the Shareholders containing amongst other things the audited Financial Statements for the year ended June 30, 2014 along with the Report of the Auditors before adoption of financial Statements for the year ended June 30, 2013 by the Members in the Annual General Meeting.

An Affidavit dated 12 January 2016 (in original) along with bank payment Challan of Rs. 15,000/- (in original) are enclosed. We shall be grateful for your kind consideration to our request and granting approvals accordingly.

Thanking You,

Yours Sincerely, .


Shoaib Ahmed
Company Secretary

Encl: As above

cc The Registrar
 Joint Stock Companies
 Securities & Exchange Commission of Pakistan
 State Life Bldg. No.2, Wallace Road, Karachi

The President,
Pakistan Stock Exchange Ltd.
Head Office, Karachi